



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NEW YORK 10007-1866

PROMPT REPLY NECESSARY
VIA EMAIL

Kristine Kring
Vice President & Associate General Counsel
Bayer Cropscience Inc.
2 TW Alexander Drive
Research Triangle Park, NC 27709
Kristine.Kring@bayercropscience.com

Re: Request for Information Pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9604(e)
789 Upper Mountain Road, Lewiston, New York

Dear Ms. Kring:

The United States Environmental Protection Agency ("EPA") is charged with responding to releases or threatened releases of hazardous substances, pollutants, and/or contaminants into the environment, and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. §§ 9601-9675 ("CERCLA"), also known as the "Superfund" law. For your information, a copy of the Superfund law may be found at www.epa.gov/superfund.

This letter seeks your cooperation in providing information and documents related to real property located at 789 Upper Mountain Road, Lewiston, New York (the "Site"). EPA has documented the release or threatened release of hazardous substances into the environment at the Site. Pursuant to CERCLA, EPA has spent public funds and anticipates spending additional public funds at the Site. We encourage you to give this matter your immediate attention and request that you provide a complete and truthful response to the attached Request for Information within 21 calendar days of your receipt of this letter.

The Site is 0.46-acre rectangular property located in a residential neighborhood. A 1,584 square-foot split-level home was built at the property in 1957. The Site property was identified in a 1986 report by the Department of Energy's Oak Ridge National Laboratory, which presented the findings of a mobile gamma scanning survey in the Niagara Falls area. The Site was identified in the report as "Anomaly 42" out of a total of one hundred anomalies exhibiting elevated radionuclide concentrations. After further sampling, the Site was determined by the Department of Energy to be ineligible for remediation under the federal Formerly Utilized Sites Remedial Action Program.

In October 2019, the current owners of the Site property hired an environmental consultant to conduct a gamma survey at the Site, which identified measurements of over 500 micro Roentgen per hour ($\mu\text{R/hr}$) in a crawlspace beneath the residence, an amount more than 30 times greater than the area's general, background gamma concentration of 10 to 20 $\mu\text{R/hr}$. The property owners notified the New York State Department of Health ("NYSDOH") of the radiation concerns, and in October 2020, NYSDOH referred the Site to EPA for further investigation. In November 2020, EPA performed a removal site evaluation and determined that there was an unacceptable risk to the residents at the Site from gamma radiation and radon inhalation, as well as radioactive dust particles originating from contaminated soils at the Site. EPA initiated removal activities at the Site in January 2021 with the installation of a radon mitigation system. EPA subsequently commenced excavation activities to remove and dispose of radioactive-contaminated fill material at the Site, including beneath the residential home and in the outside yard area. This removal work is ongoing.

Under Section 104(e)(2) of CERCLA, 42 U.S.C. § 9604(e)(2), EPA has broad information gathering authority to require persons to provide the following: information and/or documents relating to materials generated, treated, stored, or disposed of at, or transported to a facility; the nature or extent of a release or threatened release of a hazardous substance, pollutant, or contaminant at or from a facility; and the ability of a person to pay for or perform a cleanup.

While EPA seeks your cooperation in this investigation, your compliance with the attached Request for Information is required by law. In preparing your response to this Request for Information, please follow the instructions provided in Attachment A.

When you have prepared your response to the Request for Information, please sign and have notarized the enclosed "Certification of Answers to Request for Information," and return and/or scan and email that Certification to EPA along with your response (the latter of which can also be provided electronically). Please note that false, fictitious, or fraudulent statements or representations may subject you to civil or criminal penalties under federal law. In addition, Section 104 of CERCLA, 42 U.S.C. § 9604, authorizes EPA to pursue penalties for failure to comply with a Request for Information.

Some of the information EPA is requesting may be considered by you to be confidential business information. Please be aware that you may not withhold the information on that basis. If you wish EPA to treat all or part of the information that you provide confidentially, you must advise EPA of that fact by following the procedures described in the Instructions included in Attachment A, including the required support of your claim of confidentiality.

If you have information about other parties who may have information that may assist EPA in its investigation of the Site, or may be responsible for the material stored or disposed of at the Site, that information should be submitted within the time frame noted above. Please note that if after submitting your response you obtain additional or different information concerning the matters addressed by our Request for Information, you must promptly notify EPA and turn over the additional or different information to EPA.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §§ 3501-3520.

Your response to this Request for Information, which we encourage you to submit electronically, should be sent to the following:

Margo Ludmer, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 2
290 Broadway, 17th Floor
New York, New York 10007
Ludmer.Margo@epa.gov

and to:

Peter Lisichenko
On-Scene Coordinator
Superfund & Emergency Management Division
U.S. Environmental Protection Agency, Region 2
130 South Elmwood Avenue, Suite 475
Buffalo, NY 14202

If you have any technical questions regarding this letter, or would like to discuss the matter with EPA, you may call Mr. Lisichenko at (732) 321-6692 or email him at the email address listed above. Please direct all inquiries from an attorney to Ms. Ludmer at (212) 637-3187 or at the email address listed above.

We appreciate your attention to this matter and look forward to your prompt response to this letter.

Sincerely yours,

ERIC WILSON

Digitally signed by ERIC
WILSON
Date: 2022.03.22 12:43:02
-04'00'

Eric J. Wilson
Deputy Director for Enforcement and Homeland Security
Superfund and Emergency Management Division

Enclosures

ATTACHMENT A

INSTRUCTIONS FOR RESPONDING TO REQUEST FOR INFORMATION

DIRECTIONS

1. Answer Every Question Completely. A separate response must be made to each of the questions set forth in this Request for Information. For each question contained in **Attachment B** of this letter, if information responsive to this Request for Information is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.
2. Number Each Answer. Precede each answer with the corresponding number of the question and the subpart to which it responds.
3. Provide the Best Information Available. Provide responses to the best of your ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees and/or agents. Submission of cursory responses when other responsive information is available to you will be considered non-compliance with this Request for Information. Whenever in this Request for Information there is a request to identify a natural person or an entity, state, among other things, the person or entity's full name and present or last known address.
4. Identify Sources of Answers. For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.
5. Inability to Answer or Provide Documents. If you are unable to answer a question in a detailed and complete manner or if you are unable to provide any of the information or documents requested, indicate the reason for your inability to do so. If you have reason to believe that there is an individual who may be able to provide more detail or documentation in response to any question, state that person's name and last known address, email address, and telephone number and the reason for your belief.
6. Documents. If anything is deleted from a document produced in response to this Request for Information, state the reason for, and the subject matter of, the deletion. If a document is requested but is not available, state the reason for its unavailability.
7. Continuing Obligation to Provide and to Correct Information. If additional information or documents responsive to this Request for Information become known or available to you after you respond to this Request for Information, EPA hereby requests pursuant to Section 104(e) of CERCLA that you supplement your response to EPA. If after submitting your response, you discover that information you submitted is incorrect, it is necessary that you promptly notify EPA and correct such information.

8. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F). If you make a claim of confidentiality for any of the information you submit to EPA, you must separately address the following points:
- a. the portions of the information alleged to be entitled to confidential treatment;
 - b. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
 - c. measures taken by you to guard against the undesired disclosure of the information to others;
 - d. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
 - e. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
 - f. whether you assert that disclosure of the information would be likely to result in substantial harmful effect on your business's competitive position and, if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp or type "CONFIDENTIAL" on all responses and any related documents you assert to be confidential. Confidential portions of otherwise non-confidential documents should be clearly identified. You should indicate a date, if applicable, after which the information need no longer be treated as confidential. Please submit your response so that all non-confidential information, including any redacted versions of documents, are in one envelope (or electronic folder, as applicable) and all materials for which you desire confidential treatment are in another envelope (or electronic folder).

All confidentiality claims are subject to EPA review. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by Section 104(e)(7) of CERCLA and EPA's pre-disclosure notification procedures. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. EPA provides no assurances that all information that you assert as confidential business information will not be publicly disclosed. Any determination regarding public disclosure will be based on a review of the information and relevant countervailing factors.

9. Disclosure to EPA Contractor. Information that you submit in response to this Request for Information may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. Part 2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that EPA may disclose all responses to this Request for Information to one or more of its private contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Request for Information. Pursuant to 40 C.F.R. Part 2.310(h), private contractors must sign a contractual agreement that prohibits the disclosure of such information to anyone other than EPA without the prior written approval of each affected business or of an EPA legal office. If you are submitting information that you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within fourteen (14) days of receiving this Request for Information.
10. Personal Privacy Information. Personnel and medical files and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s) or in separate files, and marked as “Personal Privacy Information.”
11. Objections to Questions. If you have objections to some or all the questions within the Request for Information letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words insofar as they appear in this Request for Information.

1. The term “arrangement” means every separate contract or other agreement between two or more persons, whether written or oral.
2. The term “Company” shall mean Bayer Cropscience Inc. and its predecessors and successors, as they were or currently are named and constituted, and all subsidiaries, divisions, affiliates, and branches. The term shall include Stauffer Chemical Company, which EPA understands to be a predecessor of Bayer Cropscience Inc.
3. The term “disposal” shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
4. The term “documents” includes any written, recorded, computer-generated, visually, or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.

5. The term “entity” or “entities” refers to persons, individuals, companies, partnerships, or any other type of business association.
6. The term “hazardous substance” shall have the same definition as that contained in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances. The substances that have been designated as hazardous substances pursuant to Section 102(a) of CERCLA, 42 U.S.C. § 9602(a), (which, in turn, comprise a portion of the substances that fall within the definition of “hazardous substance” under Section 101(14) of CERCLA) are set forth at 40 C.F.R. Part 302.
7. The term “hazardous waste” shall have the same definition as that contained in Section 1004(5) of the Resource Conservation and Recovery Act, as amended (“RCRA”), 42 U.S.C. § 6903(5).
8. The term “identify” means, with respect to a natural person, to set forth the person’s full name, present or last known employer, business address, and business telephone number, as well as the present or last known home address and home telephone number. With respect to a corporation, partnership, or other business entity (including a sole proprietorship), the term “identify” means to provide its full name, address, and any affiliation or contractual relationship it has with the individual and/or Company to whom/which this Request for Information is addressed.
9. The term “industrial waste” shall mean any solid, liquid, or sludge or any mixtures thereof that possess any of the following characteristics:
 - a. it contains one or more “hazardous substances” (at any concentration) as defined in Section 101(14) of CERCLA;
 - b. it is a “hazardous waste” as defined in Section 1004(5) of RCRA;
 - c. it has a pH less than 2.0 or greater than 12.5;
 - d. it reacts violently when mixed with water;
 - e. it generates toxic gases when mixed with water;
 - f. it easily ignites or explodes;
 - g. it is an industrial waste product;
 - h. it is radioactive;
 - i. it is an industrial treatment plant sludge or supernatant;
 - j. it is an industrial byproduct having some market value;

- k. it is coolant water or blowdown waste from a coolant system;
 - l. it is a spent product that could be reused after rehabilitation; or
 - m. it is any material that you have reason to believe would be toxic if either ingested, inhaled, or placed in contact with skin.
- 10. The term “material” or “materials” means any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.
 - 11. The term “person” shall include any individual, firm, unincorporated association, partnership, corporation, trust, or other entity.
 - 12. The term “release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
 - 13. The term “Site” shall mean the real property located at 789 Upper Mountain Road in Lewiston, New York.
 - 14. The term “treatment” or “treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
 - 15. The term “waste” or “wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
 - 16. The term “waste transporters” shall mean persons who picked up hazardous substances from the Facility or who otherwise transported hazardous substances away from the Facility.
 - 17. The term “you” shall mean the addressee of this Request for Information.
 - 18. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA or RCRA, in which case the statutory definitions shall apply.

ATTACHMENT B
REQUEST FOR INFORMATION

CORPORATE INFORMATION:

1. State the correct legal name and mailing address of the Company.
2. Identify the legal status of the Company (corporation, partnership, sole proprietorship, specify if other) and the state in which the Company was organized or formed.
3. State the name(s) and address(es) of the President, Chairman of the Board, and the Chief Executive Officer of the Company.
4. If the Company is a subsidiary or affiliate of another corporation, or has subsidiaries, identify each such entity, describe the relationship between the entity and the Company, and indicate the date and manner in which the relationship was established.
5. Identify the state and date of incorporation and the agent for service of process in the State of incorporation and in the State of New York for the Company and for each entity identified in your response to Question 4, above.
6. Describe in detail the history of Bayer Cropscience Inc.'s relationship with Stauffer Chemical Company, including all changes in ownership that established this relationship (i.e., asset purchases, corporate mergers, or name changes), as well as the dates of such changes in ownership. As applicable, provide copies of any asset purchase agreements, merger documents, and/or agreements of sale, including all attachments and amendments thereto.

OPERATIONS AT OR NEAR THE SITE:

7. Identify all properties that the Company has owned and/or operated within 10 miles of the Site during the years 1930 to 1970. For each property, state the address and dates of the Company's ownership and/or operation, and provide a detailed description of the operations, processes, or business activities that the Company conducted at the property.
8. Indicate whether the Company entered into any oral or written agreements or understandings concerning the Site, or any parcels adjacent to the Site, regarding the transfer of materials to or from the Site or the adjacent parcels, including any arrangements with the current or prior property owners or operators. If so, describe the nature of these agreements or understandings and provide any relevant documents.
9. Indicate whether the Company had any relationship, formal or informal, with the below-listed individuals or entities, including regarding the transfer of materials to or from the Site or the adjacent parcels. Provide any information or documents in the Company's possession pertaining to these individuals or entities.

- a. Frank B. Brown
- b. Florence I. Brown

- c. Lillian Baer
- d. Stanley Kasprzycki
- e. Lois Kasprzycki
- f. Friona Trucking
- g. Kozdranski Trucking
- h. Holy Trinity Parish and Cemetery
- i. Pine Bowl Bowling Alleys

10. Indicate whether the Company was ever under contract with the United States Government to produce, refine, or manufacture products between 1930 and 1970. If so, provide a list of materials, quantities, and the dates of production, as well as information relating to the final disposition of the products, byproducts, and waste resulting from this activity. Provide any documents that relate to this work.
11. Please indicate whether the Company was ever under contract to provide transportation and/or disposal services for another entity in the Niagara Falls region (e.g., ElectroMet/Union Carbide or any federal agency). If so, provide a list of materials/wastes, quantities, and the dates associated with such transportation and/or disposal, as well as information relating to the final disposition of the materials/wastes. Provide any documents that relate to this work.
12. Please provide any information or documents that you may have regarding the hazardous substances and/or industrial wastes, including radioactive material, that came to be located at the Site, and provide the identity of any parties that may have been a source of, or were otherwise responsible for, the contamination. Please identify the source(s) of your information.

STAUFFER CHEMICAL COMPANY FACILITY:

13. Provide any information and/or documents you may have relating to ownership and/or operation by the Company or any other entity, past or present, of the former Stauffer Chemical Company facility on Old Lewiston Road in Lewiston, New York ("SCC Facility"). Identify the dates of your Company's ownership and/or operation of the SCC Facility, and provide copies of all documents evidencing such ownership and/or operation, including but not limited to purchase and sale agreements, deeds, leases, etc.
14. Identify any persons or entities that concurrently with the Company exercised actual control or that held significant authority to control activities at the SCC Facility, including but not limited to the following: partners or joint ventures; contractors, subcontractors, or licensees with a presence or that engaged in activity at the SCC Facility (e.g., service contractors, remediation contractors, management and operator contractors, licensees providing technical support to licensed activities); and, any person that subleased land, equipment, or space at the SCC Facility.
15. Describe in detail the nature of the operations at the SCC Facility, including but not limited to the types of work performed there and the industrial, chemical, or institutional processes undertaken at the SCC Facility.

16. List all federal, state, and local permits and/or registrations, including a description of the respective permits, issued to the Company for the transport, generation, and/or disposal of hazardous substances at the SCC Facility.
17. Provide any information and/or documents related to the industrial processes at the SCC Facility involving tantalum, zirconium, and niobium (also known as columbium), including information regarding the byproducts of such processes.
18. Indicate whether the Company received, stored, or processed uranium tetrafluoride for conversion to uranium and whether it ever processed uranium or thorium ore at the SCC Facility.
19. Provide any information and/or documents related to the nature, chemical composition, or physical state of any radioactive or potentially radioactive materials and/or waste generated, handled, stored, transported, or disposed of at the SCC Facility.
20. Provide any information and/or documents related to any sampling, surveying, or other investigatory activities performed by the Company or others that assessed whether any materials, waste, and/or environmental media at the SCC Facility exhibited characteristics of radioactive activity.
21. Please provide any information and/or documents related to the disposal of hazardous substances at or from the SCC Facility. Please include any reports, information, or data related to soil and geology at and about the disposal locations. Provide copies of all documents containing such data and information, including both past or current aerial photographs of the disposal locations, as well as documents containing analysis or interpretation of such data from the disposal sites.
22. Please provide contact information, including names, telephone numbers, email addresses, and physical mailing addresses for all persons and former employees of either the Company or other companies or government agencies that transported or disposed of hazardous substances at and/or from the SCC Facility. If no current contact information is available, provide the last known contact information.
23. Please provide contact information, including names, telephone numbers, email addresses and physical mailing addresses, for all former employees of either the Company, other companies, or government agencies that have or potentially have knowledge of operations at the SCC Facility associated with radioactive materials including the disposal of any such radioactive materials at or near the SCC Facility. If no current contact information is available, provide the last known contact information.
24. Describe the circumstances that precipitated the termination of operations at the SCC Facility, and indicate whether the operations were relocated and if so, to where.
25. Indicate whether the Company or others have ever conducted any assessments, investigations, or cleanups of hazardous substances or wastes at the SCC Facility. If yes, provide any reports

or communications generated in connection with this work.

STAUFFER CHEMICAL COMPANY LANDFILL / ARTPARK:

26. Provide any information and/or documents relating to ownership and/or operation by the Company or any other entity, past or present, of the former quarry and landfill facility located at or near 5915 Old Lewiston Road in Lewiston, New York, which now comprises Artpark ("SCC Landfill"). Identify the dates of your Company's ownership and/or operation of the SCC Landfill, and provide copies of all documents evidencing such ownership and/or operation, including but not limited to purchase and sale agreements, deeds, leases, etc.
27. Identify any persons or entities that concurrently with the Company exercised actual control or that held significant authority to control activities at the SCC Landfill.
28. Describe in detail the nature of the operations at the SCC Landfill, and provide all records documenting the types and amount of waste sent to and/or accepted at the SCC Landfill, including but not limited to copies of shipping manifests, shipping logs, receipts, weight tickets, and/or permits.
29. Indicate whether the Company has any information or documents relating to the generation, handling, storage, transportation, or disposal of radioactive or potentially radioactive materials at the SCC Landfill. If so, please provide such information and documents.
30. Provide a list of all transporters that disposed of waste at the SCC Landfill and that activity by year. If the waste was disposed of pursuant to a written contract, provide a copy of any such contract or agreement.
31. Identify all persons directly involved in overseeing activities at the SCC Landfill, including employees (with names and last available contact information) who had or have knowledge, information, or documents about the former quarry and/or the SCC Landfill operations.
32. Provide copies of boring logs, geologic reports, well logs, well locations, soil samples, and all sampling data for the SCC Landfill, including sampling locations of all such samples.
33. Provide a description of the method of waste disposal (e.g., whether the waste was compacted or crushed prior to disposal), the thickness of waste deposited, and the amount of clean cover on top of the waste.
34. Provide narrative and documentary information as to any waste that has been transferred from the SCC Landfill to any other location, including but not limited to copies of shipping manifests, shipping logs, receipts, weight tickets, and/or permits.
35. Provide the dates and circumstances under which the SCC Landfill was closed.
36. Indicate whether the Company or another entity has ever conducted any assessments, investigations, or cleanups of hazardous substances or wastes at the SCC Landfill. If yes, provide any reports or communications generated in connection with this work.

37. Provide any information and/or documents related to any sampling, surveying, or other investigatory activities performed by the Company or another entity that assessed whether any materials, waste, and/or environmental media at the SCC Landfill exhibited characteristics of radioactive activity.

UPPER MOUNTAIN ROAD LANDFILL / LOVE CANAL NORTH:

38. Provide any information and/or documents relating to ownership and/or operation by the Company or any other entity, past or present, of the former landfill facility located at or near 1169 Upper Mountain Road ("UMR Landfill"), also known as the Love Canal North Site. Identify the dates of your Company's ownership and/or operation of the UMR Landfill and provide copies of all documents evidencing such ownership and/or operation, including but not limited to purchase and sale agreements, deeds, leases, etc.
39. Identify any persons or entities that concurrently with the Company exercised actual control or that held significant authority to control activities at the UMR Landfill.
40. Describe in detail the nature of the operations at the UMR Landfill, and provide all records documenting the types and amount of waste that were sent to and/or accepted at the UMR Landfill, including but not limited to copies of shipping manifests, shipping logs, receipts, weight tickets, and/or permits.
41. Indicate whether the Company has any information or documents relating to the generation, handling, storage, transportation, or disposal of radioactive or potentially radioactive materials at the UMR Landfill. If so, please provide such information and documents.
42. Provide a list of all transporters that the Company has information of regarding the disposal of waste at the UMR Landfill and that activity by year. If the waste was disposed of pursuant to a written contract, provide a copy of any such contract or agreement.
43. Identify all persons directly involved in overseeing activities at the UMR Landfill, including employees (with names and last available contact information) who had or have knowledge, information, or documents about the UMR Landfill operations.
44. Provide copies of boring logs, geologic reports, well logs, well locations, soil samples, and all sampling data for the UMR Landfill, including sampling locations of all such samples.
45. Provide a description of the method of waste disposal (e.g., whether the waste was compacted or crushed prior to disposal), the thickness of waste deposited, and the amount of clean cover on top of the waste.
46. Provide narrative and documentary information as to any waste that was transferred from the UMR Landfill to another location, including but not limited to copies of shipping manifests, shipping logs, receipts, weight tickets, and/or permits.
47. Provide the dates and circumstances under which the UMR Landfill was closed.

48. Indicate whether the Company or another entity has ever conducted any assessments, investigations, or cleanups of hazardous substances or wastes at the UMR Landfill. If yes, provide any reports or communications generated in connection with this work.
49. Provide any information and/or documents related to any sampling, surveying, or other investigatory activities performed by the Company or another entity that assessed whether any materials, waste, and/or environmental media at the UMR Landfill exhibited characteristics of radioactive activity.

GENERAL QUESTIONS:

50. If the Company has any additional information or documents relating to the generation, handling, storage, transportation, or disposal of radioactive or potentially radioactive materials within 10 miles of the Site, please provide such information and/or documents.
51. If you have reason to believe that there may be persons who are able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, please identify such persons (with names and last available contact information) and the additional information or documents that they may have.
52. State the name, title, and address of each individual who assisted or was consulted in the preparation of the responses to this Request for Information. In addition, state whether each such person has personal knowledge of the information in the answers provided.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State/Commonwealth of _____

County/Municipality of _____

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

NAME (print or type)

TITLE (print or type)

SIGNATURE

Sworn to before me this

_____ day of _____ 2022

Notary Public